

REMARKS

Claims 1 to 33 were pending in the application at the time of the office action. Claims 1 to 33 stand rejected under 35 U.S.C. § 112, second paragraph. Claims 1 to 33 also remain rejected as anticipated.

Claims 1 to 33 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The rejection stated:

Amended independent claims 1, 12, 16, 26, and 30 does [Sic] not clearly depend on the cited specification on page 9, lines 8-17. . . . The standard XML format so that the standard XML parser can be used is different from claiming the native XML format.

Applicants fail to understand the basis for the rejection. Nevertheless, to move prosecution forward, Applicants have amended each of the independent claims to more clearly recite the invention. The description provides, at least,

. . . Only the content information is extracted from the markup document and stored in the relational database.
. . .

. . . The retrieval of data from the relational database for creating a new XML-document is also simple since all necessary content information can be easily extracted from the two tables.

Specification, Page 2 lines 33 to page 3, line 9.

When reading the claims in view of this description alone, one of skill would understand the metes and bounds of the invention. Accordingly, the independent Claims satisfy the requirements of § 112, second paragraph. However, the description further provides for example,

in this embodiment, relational database 150 includes two tables, namely an element table 160 and an attribute table 170, which represent the content of XML-document 140.

Specification, Page 8, lines 15 to 18.

The retrieval of data from database 150 for creating a new XML-document is also simple since all necessary content information is easily extracted from tables 160 and 170.

Specification, Page 9, lines 14 to 17.

Thus, the description and the claims recite how the tables are populated, that the tables include the content of the original markup document, and that the content can be retrieved and used in a new document. Accordingly, when the claims are read in view of the description, one of skill in the art will be able to determine the scope of the claims, which is all that is required by § 112, second paragraph. Applicants respectfully request reconsideration and withdrawal of the § 112, second paragraph rejection of each of Claims 1 to 33.

Claims 1 to 33 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,721,727, hereinafter referred to as Chau. Applicants respectfully traverse the anticipation rejection of Claim 1 in view of Chau.

Applicants incorporate herein by reference the MPEP requirements for an anticipation rejection as quoted in the prior response. Applicants respectfully submit that while Chau teaches a database, the database of Chau fails to teach any method in the same level of detail as recited in Claim 1. Specifically, Chau taught that the side tables, cited in the rejection, have a specific limited purpose--searching of the XML document. Specifically,

One or more side tables are created in the relational database management system, wherein each side table has one or more columns that store one or more attributes

extracted from the XML document for fast searching of the XML document. Thereafter, the side tables are used to locate data in the main table

Chau, Abstract.

Additionally, the embodiment of the invention stores XML document data in an application table, while storing particular elements or attributes in side tables. The data stored in the side tables is referred to as "metadata" and is used to search for elements or attributes in the XML documents stored as column data in the application table. During the enabling of a column which contains XML documents, side tables are created (based on the DAD) to store duplicate data of these elements or attributes.

Chau, Col. 16, lines 59 to 67.

creating one or more side tables in the relational database management system, wherein each side table has one or more columns that store one or more attributes extracted from the XML documents for fast searching of the XML documents; and
using the side tables to locate data in the main table

Cha, Col. 111, lines 49 to 54.

Thus, Chau unambiguously taught, as previously pointed out that the XML document itself is stored in a column of the main table, while side tables are created based on a DAD and are used in searching of the XML document stored in the column. There is no teaching that the side tables include the content of the document. Further, there is no teaching that data is retrieved from the side table to reconstruct the content of the document. In fact, since Chau includes the document itself in a column of the main table, the document itself can be retrieved and so there would be no reason to even consider using the side tables.

Hence, Chau fails to teach or suggest:

wherein said element table and said attribute table include content of said markup document and further wherein a new markup document having a same content as said markup document can be constructed by retrieving said element data set in each of said plurality of element records stored in said element table of said relational database and by retrieving said attribute data set in each of said plurality of attribute records stored in said attribute table of said relational database.

Accordingly, Chau fails to teach the method of Claim 1 in the same level of detail as recited in Claim 1. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Claims 2 to 11 depend from Claim 1 and so distinguish over the prior art for at least the same reasons as Claim 1 that were discussed above. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 2 to 11.

Claim 12 recites storing particular information in a particular way in four different tables. Further, Claim 12 includes language similar to that discussed above with respect to Claim 1 and so the remarks with respect to Claim 1 are applicable to Claim 12, and are incorporated herein by reference. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 12.

Claims 13 to 15 depend from Claim 12 and so distinguish over the prior art for at least the same reasons as Claim 12 that were discussed above. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 13 to 15.

Each of independent Claims 16, 26, and 30 stand rejected based upon substantially the same rationale as Claim 1. Each of these claims includes language similar to that discussed above with respect to Claim 1 and so the remarks with respect

to Claim 1 are applicable for each of these claims and are incorporated herein by reference with respect to each. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 12, 16, 26, and 30.

Claims 17 to 25 depend from Claim 16 and so distinguish over the prior art for at least the same reasons as Claim 16 that were discussed above. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 17 to 25.

Claims 27 to 29 depend from Claim 26 and so distinguish over the prior art for at least the same reasons as Claim 26 that were discussed above. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 27 to 29.

Claims 31 to 33 depend from Claim 30 and so distinguish over the prior art for at least the same reasons as Claim 30 that were discussed above. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 31 to 33.

Claims 1 to 33 remain in the application. Claims 1, 12, 16, 26, and 30 have each been amended. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on March 30, 2006.



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March 30, 2006
Date of Signature

Respectfully submitted,



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